

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170
	)	
National Association of State Utility	)	
Consumer Advocates' Petition for	)	CG Docket No. 04-208
Declaratory Ruling Regarding	)	
Truth-in-Billing	)	
	)	

**COMMENTS OF THE  
OFFICE OF PUBLIC UTILITY COUNSEL**

The Texas Office of Public Utility Counsel, ("OPC"), offers these comments pursuant to the Second Report and Order, Declaratory Ruling, and Second Further Notice of Proposed Rulemaking released in this docket on March 18, 2005. OPC represents the interests of residential and small commercial electric and telephone customers before the Texas Public Utility Commission, the courts, the Federal Energy Regulatory Commission and the FCC.

June 24, 2005

Respectfully submitted,

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